The Honorable Roy Blunt
Office of Constituent Services
308 East High Street, Suite 202
Jefferson City, Missouri 65101

Dear Senator Blunt:

Thank you for asking about this agency's work at several St. Louis County sites mentioned in Ms. Rita Sanders' letter dated March 6, 2013.

The U.S. Environmental Protection Agency's work at these sites is dedicated to accomplishing the goals Congress established under several different statutes governing remediation of nuclear-weapon-production waste. Overall, the agency carries out its statutory mission to protect public health and the environment by ordering or overseeing responsible, achievable remedies. As you might expect, the EPA's work has generated substantial public controversy, an understandable result of nuclear-contamination's risks and the difficult scientific and engineering issues this agency must address. The EPA strives to be transparent with the people in the St. Louis area throughout the long process of selecting, overseeing and implementing remedies, and has welcomed public comments all along.

St. Louis Airport Sites

The St. Louis Airport sites (SLAPS) are comprised of the "Downtown" sites located at the Mallinckrodt Chemical Plant in downtown St. Louis, and the "North County" sites located near the Lambert International Airport. Uranium ores were processed by Mallinckrodt at the Downtown site from 1942 to 1957 under contract with the Manhattan Engineering District and later the Atomic Energy Commission. The SLAPS are part of the Formerly Utilized Sites Remedial Action Program (FUSRAP) established by Congress in 1974 to enable the Atomic Energy Commission to address formerly used properties affected by historic nuclear weapons production. In 1997, Congress transferred FUSRAP responsibility from the Department of Energy (DOE)—a successor to the Atomic Energy Commission—to the United States Army Corps of Engineers (USACE). The remediation work by the EPA and USACE at SLAPS is done by USACE and is overseen by the EPA and the Missouri Department of Natural Resources.

The SLAPS cleanup was begun as follows:

- October 4, 1989 – Listed on the National Priority List
- June 29, 1990 – DOE and the EPA sign a Federal Facilities Agreement committing DOE to clean up low-level, radioactive-contaminated soils at the Downtown and North County sites
- August 27, 1998 – Record of Decision (ROD) for the Downtown sites

- September 5, 2005 – ROD for the North County sites

The remedy for both SLAPS RODs involves USACE contractors excavating radioactive-contaminated soils from numerous private and municipally owned properties and shipping by rail car to disposal facilities in Idaho or Utah. Soil excavation work is ongoing in several locations in the Downtown and North County properties—through 2012, 177,000 cubic yards of soils from the Downtown sites and 852,000 cubic yards of soil around the North County sites have been removed.

Coldwater Creek

Investigations by the EPA, DOE and USACE have attributed potential radiological contamination in Coldwater Creek to runoff or windblown migration of the prior storage of uranium-processing residues and wastes from the North County SLAPS. USACE removed the sources of these wastes, which came from ore-processing activities at Downtown SLAPS. The USACE biannually conducts sediment and water sampling at six different locations in Coldwater Creek as part of its environmental monitoring program. The USACE reports and evaluates data in its annual environmental monitoring reports.

Although USACE has taken sediment and water samples along Coldwater Creek since 1998, some data gaps still exist. As part of the plan to work from upstream to downstream, USACE sampled Coldwater Creek from McDonnell Boulevard to Frost Avenue in October and November 2012. Currently, USACE is sampling and analyzing the data along the banks adjacent to Coldwater Creek from McDonnell Boulevard to Frost Avenue. The results of the sampling will be summarized in a report expected later this year. In addition, USACE is developing a sampling plan for the portion of the creek from Frost Avenue to St. Denis Bridge. Once the sampling plan has been issued, USACE will begin sampling this stretch of the creek, the results of which will determine the density of sampling required throughout the remainder of the creek to the mouth of the Missouri River. The purpose of this final round of sampling will be to confirm that the creek meets the North County ROD's cleanup requirements or to identify and quantify any material requiring removal to meet these requirements.

West Lake Landfill

My predecessor, John Askew, approved a ROD in May 2008 to clean up Operable Unit (OU) 01, the radiologically contaminated landfill cells. The ROD described the selected remedy as follows: capping the waste in place (placing an engineered cover system over the contaminated areas), monitoring the groundwater for the long term and establishing institutional controls to restrict access.

After EPA Region 7 approved the ROD, public comments about the selected remedy persuaded this agency in 2010 to order the potentially responsible parties (PRPs) to conduct a Supplemental Feasibility Study (SFS) for OU-1. The SFS evaluated the ROD's selected remedy as well as an alternative remedy

described as full-scale excavation of all radiologically contaminated landfill material and its disposal at either a permitted, off-site facility (likely in Idaho or Utah), or in a new, on-site, engineered disposal cell. The EPA approved and released for public comment the SFS in December 2011.

Estimated costs for both remedies evaluated in the SFS exceeded the cost threshold that requires review by the EPA's National Remedy Review Board (NRRB). In early 2012, the NRRB recommended additional studies to improve the SFS. These include conducting and evaluating additional groundwater sampling to refresh the data; conducting a more detailed study of a third possible remedy; partial excavation, which would remove from OU-1 only the most- contaminated landfill material; and analyzing potential treatment technologies for the contaminated landfill material.

The EPA ordered the PRPs in June 2012 to conduct these additional studies. The first round of new groundwater sampling occurred that summer, and three more rounds will occur this year. Region 7 also conducted new vertical gamma scans of monitoring wells at OU-1 in November 2012, and updated older gamma scans of OU-1's surface in March 2013. After completing and analyzing these new studies, the EPA will release a new proposed plan to amend the 2008 ROD and will consider additional public comment.

I want to assure Ms. Sanders and you that people are not now exposed to unsafe radiation from the contaminated waste buried in OU-1 because the site is fenced to prevent public access. Groundwater beneath the site, which has been determined to be contaminated in isolated areas, is not now, never has been and will not be used as a drinking-water source.

Human Health Concerns

The Missouri Department of Health and Senior Services (DHSS) is looking into cancer rates from ZIP codes including 63031, 63033, 63034, 63042, 63134 and 63138. DHSS is expected to have this analysis complete and findings issued within the next month (Florissant Patch newspaper, March 4, 2013: http://florissant.patch.com/articles/coldwater-creek-state-health-department-investigating-cancer-cluster-instances-8e7d1718).

Thank you for sharing Ms. Sanders' concerns with us.

Sincerely,

Karl Brooks

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